

Matthew L. Rollin (SBN 332631)
SRIPLAW, P.A.
 8730 Wilshire Boulevard
 Suite 350
 Beverly Hills, California 90211
 323.452.5600 – Telephone
 561.404.4353 – Facsimile
matthew.rollin@sriplaw.com

Counsel for Plaintiff
Viral DRM LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VIRAL DRM LLC,

Plaintiff,

v.

ANTON SHUBSTORSKY,

Defendant.

CASE NO.: 3:24-cv-00733-JSC

**APPLICATION FOR ENTRY OF CLERK'S
 DEFAULT**

Plaintiff VIRAL DRM LLC (“Viral DRM”), by and through its undersigned counsel, hereby requests that the Clerk enter default in this matter against Defendant ANTON SHUBSTORSKY (“Shubstorsky”) hereto on the ground that Shubstorsky has failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure. The Declaration of Matthew L. Rollin in Support of Motion for Entry of Clerk’s Default (“Rollin Decl.”) filed concurrently herewith demonstrates that on June 11, 2024, Shubstorsky was served with his Summons and the Complaint by alternate service by serving Shubstorsky via the email address provided by Shubstorsky and Google, with a direct link to the www.sriplaw.com/notice website where all documents associated with this matter available for Shubstorsky to access and download, and on June 12, 2024, Shubstorsky was also served by alternate service by a WhatsApp message via

1 the phone number provided by Shubstorsky and/or Google, which also contained a direct link to the
2 www.sriplaw.com/notice website.

3 The time allowed for Shubstorsky to respond to the Complaint has expired. Neither Viral
4 DRM nor the Court has granted Shubstorsky an extension of time to respond to the Complaint.
5 Shubstorsky Defendant has failed to answer or otherwise respond to the Complaint, or serve a copy
6 of any Answer or other response upon Viral DRM's attorney of record.

7 Viral DRM is informed and believes that Shubstorsky is not considered an infant or
8 incompetent person.

9 Viral DRM is informed and believes that the Servicemembers Civil Relief Act does not
10 apply, as Shubstorsky is a foreign individual.

11 WHEREFORE, Plaintiff VIRAL DRM LLC requests that a default be entered by the Clerk
12 against Defendant ANTON SHUBSTORSKY and for such other and further relief as to the Court
13 deems just and proper in the premises.

14
15 DATED: July 02, 2024

Respectfully submitted,

16 /s/ Matthew L. Rollin

17 MATTHEW L. ROLLIN

18 **SRIPLAW, P.A.**

19 *Counsel for Plaintiff*

20 *Viral DRM LLC*
21
22
23
24
25
26
27
28